

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GOVERNMENT'S PROPOSED QUESTIONS FOR THE JURY VENIRE

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Paul R. Moore, hereby requests that, in addition to those questions commonly put to the venire in cases commenced in this Court, the Court pose the following questions to the prospective jurors in this case:

1. The United States of America is one of the litigants in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, or any member of your immediate family, or anyone with whom you are close:

 - (a) ever been arrested, or ever answered charges (other than for an alleged moving traffic violation) in a criminal proceeding?
 - (b) ever filed a lawsuit or claim of any kind against any police or other law enforcement officer?
 - (c) ever engaged in litigation with the federal government, that is, ever filed a claim or lawsuit against the United States or any of its agencies, or answered some claim made against you by the federal government?
 - (d) been employed by the United States Attorney's Office, the United States Probation Office, the United District Court Clerk's Office, the United States Marshal's Service, or the Federal Bureau of Investigation, also known as the "FBI"?
 - (e) ever been employed by, or had any involvement of any sort with the Brockton Police

Department or the Massachusetts State Police?

2. Are you aware of any prejudice that you may have against the government or any police agency of the government that would in any way impair your ability to evaluate and judge fairly and impartially the facts of this case?

3. Some of the witnesses expected to be called by the United States at trial are members of the Massachusetts State Police, Bureau of Alcohol, Tobacco and Firearms and the Brockton Police Department. One or more of these law enforcement officers may be called to testify as to certain matters in this case calling for specialized knowledge and skill, such as firearms investigations.

Are you aware of any prejudice that you might have for or against a witness or other individual in this case where that witness or individual is a law enforcement officer?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

November 14, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney for defendant STEPHEN DAROSA, Eugene Patrick McCann, Esq., on November 14, 2005, via electronic filing (Manzi & McCann, Attorneys At Law, 59 Jackson Street, Lawrence, Massachusetts 01840).

/s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney